

EXHIBIT C

**EXHIBIT 50
UNREDACTED VERSION
OF DOCUMENT SOUGHT
TO BE SEALED**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CISCO SYSTEMS, INC.,)
)
Plaintiff,)
) Case No.
vs.) 5:14-cv-05344-BLF (PSG)
)
ARISTA NETWORKS, INC.)
)
Defendant.)
)
_____)

*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF BALAJI VENKATRAMAN
Palo Alto, California
Tuesday, May 2, 2016
Volume I

Reported by:
CARLA SOARES
CSR No. 5908
Job No. 2302931
Pages 1 - 116

Page 1

1 A So the commands such as show, the show
2 command, show interface, these are all generally
3 common to devices from multiple vendors and would be
4 candidates for being part of the standard.

5 Q But do you know, are you aware as you sit
6 here today of any website or document where I could
7 go find the standard that you're referring to?

8 A I have not gone and researched any website
9 where one can find the standard.

10 Q Are you aware of where, if someone wanted
11 to go find the standard, they could go locate a
12 specific document or locate a specific website where
13 that standard would actually exist?

14 A R&D teams that are responsible for
15 creating the CLIs would know, and there are
16 generally well-known standards body websites where
17 such information might be available. I have not
18 gone and looked or researched that.

19 Q Have you ever had a conversation with
20 anybody at HP's R&D department where they suggested
21 or told you that there is a document or a website
22 they could go to to check on this command line
23 interface standard?

24 A No, I have not.

25 Q So how is it that you know one exists?

1 A So these are industry standards that most
2 vendors implement in order to present a consistent
3 interface.

4 Sometimes standard -- every document that
5 HP referred to had "industry standard" in quotes.
6 So sometimes a standard is as published by an
7 industry organization like IETF or ITU in some
8 cases.

9 The industry practices have evolved to
10 adopt a common set of commands, and so they are also
11 generally referred to as standards. But they may
12 not be a specific document like an FTP protocol or
13 an OSPF, which are standards published by -- in the
14 documents. So the definition of "standard" may
15 vary.

16 Q Got it.

17 So it's possible then, when the exhibits
18 that you just walked through with counsel reference
19 industry standard, they're not referring to a
20 specific set standard by a standards-setting body,
21 but just sort of a general way to describe the type
22 of CLI that HP uses?

23 A Correct.

24 Q Now, you would agree with me, sir, that
25 there are multiple ways to implement a specific CLI

1 command, right?

2 A Yes, there are multiple ways to implement
3 CLI.

4 Q And different companies can and do, in
5 fact, create their own CLI commands using different
6 words and syntaxes, correct?

7 A Correct. The syntax may vary across
8 vendors.

9 Q And I believe you testified earlier that
10 vendors, in some instances, have their own
11 proprietary modifications to the industry standard
12 command line interface, correct?

13 A Correct.

14 Q And does HP have its own proprietary
15 commands?

16 A I'm sure HP has proprietary extensions to
17 the CLI.

18 Q And in those instances, HP would be using
19 a different CLI command than, for instance, Juniper
20 to configure a network device, correct?

21 A Correct. HP syntax would be different and
22 documented.

23 Q So it's fair to say then that even though
24 a CLI command might be similar across different
25 vendors, they can be different, correct?

1 MR. SANTACANA: Objection. Calls for
2 opinion testimony.

3 THE WITNESS: Either they are the same or
4 they are different.

5 BY MR. HOLMES:

6 Q Right. They can be similar but different?

7 A The syntax may vary.

8 Q Now, you discussed earlier with counsel a
9 product called Network Automation product.

10 Do you remember that?

11 A Yes.

12 Q And that's an HP product?

13 A Correct.

14 Q And the analogous product, I believe, that
15 is -- that HP OEMs for Cisco is the Cisco Network
16 Compliance Manager; is that right?

17 A Correct.

18 Q Now, the HP Network Automation product,
19 that's not a router, is it?

20 A No.

21 Q And it's not a switch, correct?

22 A No.

23 Q And I believe your testimony is that the
24 Network Automation product, in fact, supports
25 various network elements, right?

1 A Yes.

2 Q And so it's fair to say that the Network
3 Automation product is complementary to a router or a
4 switch, correct?

5 A The Network Automation product is a
6 software product that helps manage the
7 configuration -- changes to the configuration and
8 compliance across multiple vendors.

9 Q Would it be fair to say that the Network
10 Automation product does not specifically compete in
11 the marketplace with a switch or a router?

12 A That is correct. We -- the switch and the
13 router is not competitive to Network Automation.

14 Q Sir, have you read Cisco's complaint that
15 it filed against Arista?

16 A No.

17 Q Have you read any of the Cisco patents
18 that have been asserted against Arista in this case?

19 A No.

20 Q You've never, I assume then, read any of
21 the claims that are associated with Cisco's patents
22 that are asserted in this case?

23 A That's correct.

24 Q And, sir, you're not a lawyer, are you?

25 A No.